

From: (b) (6)
Sent: Wednesday, September 07, 2016 12:45 AM
To: HarborComments
Subject: My Portland Harbor Comment

Dear US EPA:

The Willamette River and the stretch of the Portland Harbor Superfund are located in the valley that is and was home to the Kalapuya and other native tribes of people who lived on and actively tended the land and these waters for thousands of years. It's only in the past couple hundred years when white people started occupying the land and innovating ways of doing things without historical or future-focused knowledge or perspectives that we started heavily polluting the waters with organic and inorganic wastes. Because of the history of oppression of all people of color, and particularly because people of color have been exposed to disproportionately more contamination and hazardous waste around the country, Superfund sites such as the Portland Harbor are of significant environmental justice issue. Many marginalized communities have cultural and/or economic need for subsistence fishing in the Willamette. An executive order by President Clinton in 1994 mandated analysis and taking into account populations that depend on subsistence fishing. The EPA recognized this and that it had yet to be incorporated into action when it released an Environmental Justice Analysis in 2013 for the Lower Duwamish Waterway Cleanup, but has not analyzed environmental justice for the Portland Harbor. The EPA has a responsibility to ensure a more equitable community-based cleanup process and outcome. We have that opportunity now with the Portland Harbor Superfund. Cost analysis is necessarily a part of the balancing act in proposing a cleanup plan that takes into account all interested and responsible parties. The complexity of including environmental justice into the cost analysis adds immense challenge but must be included in order to move toward a necessary equitable future. We can begin now, though we must create a new map.

We have a responsibility to wildlife, to native people who have called this area home for thousands of years, to communities who can't afford other healthy food. We have an opportunity to clean up the pollution, and to return our precious waterway to healthy ecology. We know that resident fish in the Portland Harbor are not safe to eat and yet there is no effective way to convey that to osprey and eagles, to communities who speak more languages than we can place on advisory signs or reach out to. The effects of the most toxic chemicals known to humankind in combination with each other are highly under-researched. The safest thing to do is to remove as much of the contamination as possible by dredging- by many accounts more than 1000 acres of river bottom dredging is needed. Monitored Natural Recovery (MNR), with or without enhancement has not been shown to be effective and therefore EPA needs to reduce the use of MNR, enhance the monitoring to annually, and include provisions in the R.O.D. for

contingency actions if monitoring data indicate unsatisfactory performance results. I ask the EPA to adopt Alternative G with enhancements that ensure long-term cleanup effectiveness.

While active cleanup is under way, air and water quality monitoring are essential to catch and change any practices that spread toxic contamination, and that any such contamination spreads/leaks be remedied quickly. Please select disposal options that treat dredged sediment to breakdown or bind contaminants so we do not pass on the contamination to another location and people for generations to come.

Because Institutional Controls (IC) are not effective, especially in the long term, reduce the need for ICs, and include in the ROD provisions for PRPs covering the costs of ICs, and provisions for evaluating the IC effectiveness with regular program modifications.

Require the state of Oregon to continue upland sources control via legally enforceable means; the current text indicates that this approach "May" be taken.

EPA needs to require installation of environmental and quality of life monitoring during the construction phase, with the PRP's covering the cost. This provision needs to be a required element and clearly stated. All affected communities need regular opportunities to provide input during the construction phase of the cleanup.

The general goals and design characteristics/requirements of the fish tissue monitoring need to be specifically listed in the R.O.D.

Habitat restoration following remedy construction needs to be a required element in the R.O.D. Aquatic habitat that is disturbed by the remedy must be restored and the full cost paid by the PRPs. When nearshore and intertidal habitat has to be removed, it must be replaced and replanted with submerged aquatic vegetation that thrives.

The final remedy must comply with state environmental quality, especially the water quality criteria for the PTW contaminants. PCBs, dioxins and DDTs in water and fish must meet state water quality standards. When the data are obtained for the remedial design, these must be shared with the community.

The final result of the cleanup should be the lifting of the Fish Consumption Advisory related to PCBs for the Portland Harbor area by a specific date.

The US EPA should lead the cleanup effort after the ROD, not the State of Oregon. Sediment should be removed from the Swan Island area rather than implementing a massive input of carbon as a treatment.

It's important that we do the most thorough cleanup possible the first time around using the best possible technologies, rather than using the cheapest technologies that spread toxic chemicals and require more monitoring and further cleanup later. Especially when taking into account the damage already being done in the health of wildlife and fish dependant human communities, the most cost effective solution is a stronger cleanup the first time. Please include atmospheric transport in analysis of exposures. This inclusion will indicate the extent to which remaining contamination will expose humans in the community to unacceptable risks.

The river is our life. Without healthy waters, nothing will survive. We have the knowledge, power, and technologies to clean the Willamette well and the responsibility to do so. I want to safely fish and eat from the Willamette River and I want my children and grandchildren to have the ability to do so. We can and should return the river to a healthy state as quickly as possible.

Please let me know how you will incorporate our comments into the R.O.D. Thank you.

With hope,

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